

TRANSMITTING REDACTED INFORMATION—FOR PUBLIC INSPECTION

May 6, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

**Re: Telephone Number Portability, et al., CC Docket No. 95-116, WC Docket Nos.
07-149 & 09-109**

Dear Ms. Dortch:

Pursuant to the Second Protective Order in this proceeding,¹ I am filing the attached *ex parte* and attachment, which contain redacted information that was previously filed under the Second Protective Order. A highly confidential version was also filed with the FCC.

Respectfully submitted,



John T. Nakahata

¹ *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration, et al.*, Second Protective Order, DA 16-344, 2016 WL 1275357, at *2 ¶ 3 (Wireline Comp. Bur. 2016).

TRANSMITTING REDACTED MATERIAL – FOR PUBLIC INSPECTION

May 6, 2016

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Re: *Telephone Number Portability, et al.*, CC Docket No. 95-116, WC Docket Nos. 07-149 & 09-109

Dear Ms. Dortch:

On May 5, 2016, Richard Jacowleff and Tara Diaz of Telcordia Technologies, Inc., and Mark Davis and I of this firm met separately with Commissioner Rosenworcel and Travis Litman, Commissioner Pai and Brendan Carr, Commissioner O’Rielly and Amy Bender, Diane Cornell of the Chairman’s Office, and Rebekah Goodheart of Commissioner Clyburn’s office. In the meetings, we made the following points.

The Commission should expeditiously approve the Master Services Agreement (“MSA”) between Telcordia and the NAPM LLC. Time is of the essence because until the MSA is approved, Telcordia cannot sign critical contracts that must be in place soon if the project is to stay on schedule. In particular, Telcordia needs to be able to execute contracts with SungardAS for construction of data centers, which will take time to build and without which testing cannot occur.

The LNP Alliance has raised concerns that small carriers could incur large up-front costs as a result of the transition and that these costs could swamp any savings from the transition. These concerns have no basis in reality. For those small carriers that access the NPAC through a service bureau, they have no new charges from Telcordia due to the transition. They will, however, see their share of the nationwide LNPA fee drop dramatically. And since they do not interact with the NPAC, they would not have to undertake new training or testing. As previously explained, Telcordia will have rigorous testing with the gateway manufacturers and then with the service bureaus to ensure that the systems the service bureaus use will operate correctly at transition. Furthermore, as discussed further below, although the service bureaus will have some one time set-up fees and training, the reduction in recurring fees will quickly offset those costs.

Some slightly larger users (including some service bureaus) may access the NPAC through a GUI web interface. Although those users will have some one time set-up charges – which are set at levels well below what Neustar charges today – as shown on the attached chart (Scenarios 1 and 2), Telcordia is also reducing the recurring monthly service charges well below the levels charged by Neustar; accordingly, those set-up charges should be fully offset within a small number of months.¹ Any testing by the GUI users should be modest, given the simplicity of the GUI interface, which contains only a limited number of fields already specified in the publicly available FRS specifications. Those providers may want to undertake training, but there will be no charge training options available. Again, this does not even include savings from the dramatic drop in their allocated share of the regionwide LNPA fee.

Finally, a somewhat larger user may choose to implement a mechanized interface. Scenario 3, attached, shows that such a user also will see its one-time set-up charges offset by reduced monthly recurring fees within a short number of months.

The Commission should reject Neustar's Application for Review for the reasons stated in Telcordia's Opposition. The Second Protective Order is a garden-variety protective order that closely follows the Commission's protective order policies. The only significant difference from the Commission's model protective order is the limitation on the number of reviewers of security information – which is completely reasonable given the risks posed from widespread dissemination of security information. Neustar does not challenge the designation of any particular information under the Order but essentially argues that there should be no protective order at all. This is patently absurd—it is not seriously debatable that the Master Services Agreement contains confidential commercial information, including information about Telcordia's security, the prices it bid, and penalties for failure to meet contractual requirements. To the extent that Neustar wishes to claim that a particular provision was improperly designated, this is not a proper challenge to the protective order, which provided a mechanism for making such challenges before the Bureau.

Nor does Neustar have any need to see the Master Services Agreement in order to fulfill its transition obligations. The Master Services Agreement is primarily a legal document that does not contain detailed technical specifications. Telcordia has shared with Neustar information necessary for the transition, such as the format specifications for the test data to be transferred, and the TOM continues to manage those processes. With respect to Neustar contractual obligations, those are governed by Neustar's agreements with the NAPM (to which Telcordia is not privy), and not by the Master Services Agreement.

Telcordia appreciates the Commission's work on the LNPA contract and looks forward to executing the MSA as soon as possible.

¹ Notably, for a new user that comes to the system after cutover to Telcordia, such as an interconnected VoIP provider that begins to receive numbers directly from the NANPA or Polling Administrator, because these set-up charges are lower than what Neustar charges, they are also better off under the Telcordia MSA.

Marlene H. Dortch
May 6, 2016
Page 3 of 3

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John T. Nakahata', written in a cursive style.

John T. Nakahata

cc: Meeting Participants (by electronic mail)

Scenario 1: Service Provider A has one LTI user that directly accesses NPAC via VPN

Charge Element	Unit/Frequency	Quantity	Incumbent Price*		iconectiv Price	
			Per Item	Total	Per Item	Total
LTI Logon ID Establishment	Per Logon ID Establishment/ Once	1 (LTI user)	\$1,000	\$1,000		
VPN access to NPAC	Per port/ Monthly	1 (VPN port)	\$400	\$400		
Total Service Provider A charges for first month				\$1,400		
Total Service Provider A charges after first month				\$400		
Payback Period for One Time Costs (Months)**						

Scenario 2: Service Provider B has 25 LTI users and up to 10 LTI concurrent users access NPAC via VPN

Charge Element	Unit/Frequency	Quantity	Incumbent Price*		iconectiv Price	
			Per Item	Total	Per Item	Total
LTI Logon ID Establishment	Per Logon ID Establishment/ Once	25 (LTI users)	\$1,000	\$25,000		
VPN access to NPAC	Per port/ Monthly	10 (VPN ports/ concurrent users)	\$400	\$4,000		
Total Service Provider B charges for first month				\$29,000		
Total Service Provider B charges after first month				\$4,000		
Payback Period for One Time Costs (Months)**						

Scenario 3: Service Provider C is a mechanized User with 1 DS1 for primary, 1 DS1 for secondary, SOA-1 Primary SPID, LSMS

Charge Element	Unit	Quantity	Incumbent Price*		iconectiv Price	
			Per Item	Total	Per Item	Total
Key List Exchange (Logon ID) Establishment	Per Logon ID Establishment/ Once	4	\$1,000	\$4,000		
Mechanized User Interface	Per System Type/ Once	2	\$17,600	\$35,200		
DS1 connection to Primary NPAC Location	Per Port	1	\$4,000	\$4,000		
DS1 connection to Secondary NPAC Location	Per Port	1	\$4,000	\$4,000		
Total Service Provider C charges for first month				\$47,200		
Total Service Provider C charges after first month				\$8,000		
Payback Period for One Time Costs (Months)**						

* Incumbent Price is from Amendment 70, Exhibit E.

** Payback Period is the One Time iconectiv charges shown in each table divided by the monthly recurring fees savings between iconectiv's pricing vs current Neustar pricing for elements shown. Does not include additional savings due to reductions in a carrier's allocated share of nationwide charges.